

**STATE OF LOUISIANA  
DIVISION OF ADMINISTRATIVE LAW**

**LOUISIANA BOARD  
OF ETHICS**

**IN THE MATTER OF**

**PAULETTE BRUNO**

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**DOCKET NO.**

**AGENCY TRACKING NO. 2011-1442**

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**CHARGES**

The Louisiana Board of Ethics voted on November 15, 2012 to and does hereby file the following charges:

**1.**

Advocates for Innovative Schools, Inc., d/b/a Robert Russa Moton Charter School was authorized by the Orleans Parish School Board to operate as a charter school by the Orleans Parish School Board beginning on June 1, 2006.

**2.**

Charter Schools are subject to the Louisiana Code of Governmental Ethics as provided in La. R.S. 17:3996B(20) which provides as follows:

B. Notwithstanding any state law, rule, or regulation to the contrary and except as may be otherwise specifically provided for in an approved charter, a charter school established and operated in accordance with the provisions of this Chapter and its approved charter and the school's officers and employees shall be exempt from all statutory mandates or other statutory requirements that are applicable to public schools and to public school officers and employees except for the following laws otherwise applicable to public schools with the same grades:

(20) Code of Governmental Ethics, R.S. 42:1101 et seq., with the exception of R.S. 42:1119 as it applies to any person employed by a charter school prior to August 15, 2003.

**3.**

Paulette Bruno has been employed as the principal/chief executive officer of the Robert Russa Moton Charter School since October 15, 2008. As the principal/chief executive officer, Ms. Bruno is considered an “agency head” as that term is defined in La. R.S. 42:1102(3).

**4.**

Suzanne Encalarde has been employed at the Robert Russa Moton Charter School as a certified teacher since July of 2008. On September 18, 2010, Suzanne Encalarde became the Daughter-in-law of Paulette Bruno. Ms. Encalarde is considered to be a member of Ms. Bruno’s “immediate family” as that term is defined in La. R.S. 42:1102(13).

**5.**

On September 1, 2011, Ms. Suzanne Encalarde was promoted to the position of “Mentor Teacher.” The promotion to this position provided Ms. Encalarde an additional salary of \$3,000 per year.

**6.**

Paulette Bruno, signed the personnel action forms regarding Ms. Encalarde’s promotion, as well as recommending to the Robert Russa Moton Charter School Board that Ms. Encalarde receive the a salary increase.

**7.**

L’Tanya Dionne Randolph Bruno is the daughter-in-law to Paulette Bruno. Ms. Randolph Bruno became the daughter-in-law of Ms. Bruno on July 9, 2005. Ms. Randolph Bruno is considered to be a member of Ms. Paulette Bruno’s “immediate family” as that term is defined in La. R.S. 42:1102(13).

**8.**

On July 13, 2009, L’Tanya Randolph Bruno was hired by the Robert Russa Moton Charter School to the position of “Data Manager.” The forms which engaged Ms. Randolph Bruno as an employee of the Robert Russa Moton Charter School were signed by Ms. Paulette Bruno.

**9.**

On July 18, 2011, Ms. Randolph Bruno received an additional salary increase of \$3,300. Ms. Paulette Bruno signed the forms which allowed Ms. Randolph Bruno to receive the salary increase.

**10.**

La. R.S. 42:1112B(1) provides that no public servant shall participate in a transaction involving the governmental entity in which, to his actual knowledge, any member of his immediate family, has a substantial economic interest.

**11.**

Based on the foregoing facts, Paulette Bruno, violated La. R.S. 42:1112B(1) by participating in transactions under the supervision and jurisdiction of her agency, the Robert Russa Moton Charter School, in which her daughter-in-law, Suzanne Encalarde had a substantial economic interest.

**12.**

Based on the foregoing facts, Paulette Bruno, violated La. R.S. 42:1112B(1) by participating in transactions under the supervision and jurisdiction of her agency, the Robert Russa Moton Charter School, in which her daughter-in-law, L'Tanya Dionne Randolph Bruno had a substantial economic interest.

**13.**

La. R.S. 42:1119A provides that no member of the immediate family of an agency head shall be employed in his agency.

**14.**

Based on the foregoing facts, Paulette Bruno, violated La. R.S. 42:1119A by virtue of the employment of her daughter-in-law, L'Tanya Dionne Randolph Bruno, with the Robert Russa Moton Charter School.

**15.**

In accordance with La. R.S. 42:1141C (3)(b)(iv), the Board designates, Michael Dupree and Suzanne Mooney as the Board's trial attorneys in this matter.

**WHEREFORE**, the Louisiana Board of Ethics requests that the Ethics Adjudicatory Board (a) conduct a hearing on the foregoing charges; (b) determine that Paulette Bruno violated La. R.S. 42:1112B(1) and La. R.S. 42:1119A, with respect to the foregoing counts; and (c) assess an appropriate penalty in accordance with the recommendation of the Louisiana Board of Ethics to be submitted at the hearing.

**[SIGNATURE AND SERVICE INFORMATION ON THE FOLLOWING PAGE]**



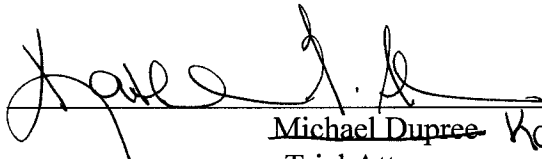
Mr. Blake Monroe  
Chairman, Louisiana Board of Ethics  
P.O. Box 4368  
Baton Rouge, LA 70821  
Telephone: (225) 219-5600  
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**SERVICE INFORMATION:**

Paulette Bruno  
3774 Gentilly Blvd.  
New Orleans, LA 70122

**CERTIFICATE:**

I hereby certify that a copy of this document has been forwarded to the Respondent or his  
Counsel of Record by registered/certified mail in accordance with La. R.S. 42:1141E(1)(a), on this  
19<sup>th</sup> day of November, 2012.

  
~~Michael Dupree~~ Kathleen M. Allen  
Trial Attorney